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October 11, 2018

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OUR FILE NO. 170558-25

Via Email and ECF

Honorable James B. Clark, III, U.S.M.J.
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
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Newark, New Jersey 07101
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**Re: Ramapough Mountain Indians, Inc., et al. v. Township of Mahwah, et al.
Case No 2:18-cv-09228 (CCC)(JBC)**

Dear Judge Clark:

This firm represents the Ramapo Hunt & Polo Club Association, Inc., a non-profit corporation of the State of New Jersey (the "Association"), and a defendant in the above-referenced matter.

The parties are currently engaged in ongoing mediation with court-appointed mediator, Sheryl M. Goski, Esq. The parties first met for mediation on September 27, 2018. The parties met for a second mediation session on October 3, 2018. While the parties have not settled at this time, discussions are ongoing and the next mediation session is scheduled for October 17, 2018.

On September 21, 2018, Plaintiffs moved for leave to file an amended complaint, which motion was initially returnable October 15, 2018. ECF No. 42. The Complaint (ECF No. 1) and the proposed Amended Complaint ("PAC") (ECF No. 42-2) are substantially different, both in terms of the parties, the facts, and the legal theories. Both Mahwah and the Association exercised their rights under Rule 7.1(d)(5) for an automatic extension of the return date of the motion. ECF Nos. 49, 50.

Forty-Eight Years of Service

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There has been a discussion about adjourning Plaintiff's motion to amend the complaint for one motion cycle. There was a discussion on who would make it. We volunteered to make this request after some back and forth, and I am advised by the mediator, Sheryl Goski, that all parties have consented. Prior to sending this letter, we circulated to the attorneys for all parties an email to confirm their consent to send this letter. In the interim, we also note that Ruby Kumar-Thompson, Esq., on behalf of the Township of Mahwah, also sent a separate request for the postponement of the motion to amend the Complaint.

Given the parties' ongoing settlement discussions, and at the suggestion of Ms. Goski, the mediator, the parties therefore respectfully request an adjournment of Plaintiffs' motion for leave to Amend (ECF No. 46) by one motion cycle, making that motion returnable on November 19, 2018.

Finally, on September 24, 2018, this Court held the *Rule* 16 conference, at which time this Court set a deadline of October 12, 2018 for the exchange of *Rule* 26(a) disclosures. ECF No. 48. The parties therefore also respectfully request an adjournment of the deadline to exchange *Rule* 26(a) disclosures until November 28, 2018, nine days after the return date of the motion to amend.

Thank you for considering this request by the Association for the benefit of all the parties.

Respectfully submitted,



John J. Lamb

JJL:lb

cc: Sheryl M. Goski, Esq. (via email)
Counsel of Record (via ECF)